UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

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IN RE JOHNSON & JOHNSON

SUPPLEMENT TO

TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

PRODUCTION OF TALC
SAMPLES FROM IMERYS
TALC AMERICA INC.

WHEREAS, on February 21, 2018 this Court entered the Agreed Order and Stipulation Regarding Production of Talc Samples From Imerys Talc America, Inc. (Doc. 4757) ("the February 21, 2018 Order"); and

WHEREAS, since the entry of that Order, Imerys Talc America, Inc. ("Imerys") has made a supplemental disclosure of additional historical samples of talc provided to Johnson & Johnson for Johnson's Baby Powder or Shower to Shower in its possession; and

As used in the February 21, 2018 Order, "historical" refers to samples taken prior to 2014.

WHEREAS, pursuant to the terms of the February 21, 2018 Order, the parties wish to supplement the February 21, 2018 Order to include the samples identified in Exhibit 1 attached hereto;

IT IS THEREFORE AGREED AND ORDERED THAT the samples identified in Exhibit 1 attached hereto are hereby incorporated into the February 21, 2018 Order;

IT IS FURTHER AGREED AND ORDERED THAT, for the purposes of the samples identified in Exhibit 1 attached hereto, within thirty (30) business days of the entry of this Agreed Order, plaintiffs will select and identify to defendants in writing a reasonable number of talc samples from the inventories attached to Exhibit 1. Imerys reserves the right to challenge the number of talc samples selected by plaintiffs as excessive or otherwise unreasonable, but must do so in writing within seven (7) days after plaintiffs provide their written selections to Imerys. To the extent that Imerys objects to the number of talc samples, the parties shall meet and confer within fifteen (15) days of the objection in an effort to resolve the parties' dispute. If the dispute cannot be resolved by agreement, plaintiffs' counsel shall present the dispute to Judge Pisano initially by letter, consistent with Local Civil Rule 37.1(a)(1), before filing a formal motion for an order.

IT IS FURTHER AGREED AND ORDERED THAT, for the purposes of the samples identified in Exhibit 1 attached hereto, within fifteen (15) days of the entry

of this Order, Imerys shall deliver, or cause to be delivered, all talc samples to Alliance Technologies LLC in Monmouth Junction, New Jersey, an independent testing laboratory that is DEA licensed, FDA registered, and which employs good laboratory practices ("the Laboratory"). Following agreement by the parties on the talc samples to be divided (or, to the extent there is a dispute, an order of either Judge Pisano or the Court), the parties, in coordination with the Laboratory, shall agree on a date for the division of the Selected Samples pursuant to the terms of this Order.

IT IS FURTHER AGREED AND ORDERED THAT unless otherwise specifically stated herein, all other portions of the February 21, 2018 Order, remain in effect and apply to all samples identified in both the February 21, 2018 Order and the samples identified in Exhibit 1 attached hereto.

SO ORDERED, this 2nd day of July, 2018.

Let & Walf
United States District Judge

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STIPULATED AND AGREED:

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s/ Mark K. Silver

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EXHIBIT 1

INVENTORY OF BAGS OF TALC IN THE "LANZO" BOX

#	Date	Written on Talc Box
1.	2/20/85	Grade 96 Lroug Lee Pulp, Level 2 ¾, Regent 15 cc, 30 cc, 1/3
2.	1967	66 Grade Annual Comp.
3.	1968	66 Grade Annual Comp.
4.	1969	66 Grade Annual Comp.
5.	1970	66 Grade Annual Comp.
6.	1971	66 Grade Annual Comp.
7.	1972	66 Grade Annual Comp.
8.	1973	66 Grade Annual Comp.
9.	1974	66 Grade Annual Comp.
10.	1975	66 Grade Annual Comp.
11.	1976	66 Grade Annual Comp.
12.	1977	66 Grade Annual Comp.
13.	1978	66 Grade Annual Comp.
14.	1979	66 Grade Annual Comp.
15.	1980	66 Grade Annual Comp.
16.	1981	66 Grade Annual Comp.
17.	1982	66 Grade Annual Comp.
18.	1983	66 Grade Annual Comp.
19.	1984	66 Grade Weekly Comp.
20.	1987	66 Grade Annual Comp.

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		The cup samples are transloading samples from bulk 96 trailer unloading and RC microbe autosampler (4	sets from each process)	Railcar Samples Grade 96	ACFX42618	16 cup samples	Final Composite Sample	ACEXA3601 (43861)		Final Composite Sample			16 cup samples	Final Composite Sample		SHPX42865	16 cup samples	Final Composite Sample											-	-
322689823	West Windsor Silo 4 "96" Trial Run 10/9 - 10/18/01 Batch 2794-2802	Box contains Grade 96 shift composite samples and railcar shipment samples; Shift samples have run hours	Written on bag		10/9/2001 Shift I	Shift II	10/10/2001 Shift #	Shift III		Shift III	10/12/2001 Shift !	Shift II	10/13/2001 Shift I	10/17/2001 Shift II	Shift III	10/18/2001 Shift i	Shift II												_	
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SKP Box Number

322689809

Box Description

Monthly Float Feed Composite Samples

FF Jan 1998

FF Feb 1998

FF March 1998

FF Monthly Comp April 1998

FF Monthly Comp May 1998

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WW FF July 1998

FF Aug 1998

FF Sept 1998

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FF Nov 1998 Monthly Comp

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Sample description	APR 2012 Houston composite- Grade 25 USP	May 2012 Houston composite - Grade 25 USP	RM Chinese #2- Olympic H	Grade 25 USP	Pre-Grind CH 2 ore composite sample	Jan 2013 Houston Compsoite- Grade 25 USP	FEB 2013 Houston Composites- Grade 25	RM Chinese #2	RM Pre - Grind	CH@2 Grade 25 USP Feb 14	Grade 25 CH#2 March 2014	A 2014 Houston Compositor, Grade 25 USP	Api 2014 nousion composites chace to con	Cimpact 710	Grade 25 USP	Grade 25 USP	Grade 25 USP	Grade 25 USP	Sant '14 Grade 25 Ch#2	2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	Oct '14 Grade 25 Ch #2	Nov. '14 Grade 25 USP Chinese #1
Project Description	3 TEM analysis of April 2012	3 TEM analysis of Houston Composites, May 2012	3 Characterization of Chinese #2, M.V. Jin Run	1 Houston Monthley Fiber Management Samples (December)	A Characterization of Chinese # 1 & 2 ore from MV Jin Shun	1 TEM analysis of Houston Composites, Jan 2013	5 TEM analysis of Houston Composites. February 2013	2 Characterization and TEM of Guandxi #2 from M.V. Ning Bo Dolphin	2 Characterization Analysis of Guandxi #2 ore. M.V. "Cymbeline"	E Inguistand Echinary Houston Fiher Management Samples	Substitute of the standard Commention March 2014	3 EM analysis of housing Composites, March 2014	2 TEM analysis of Houston Composites, April 2014	1 Characterization of Guangxi #2 from "MV Popi S"	4 Houston May Fiber Management Samples	A Houston June Fiber Management	A Louiston M4 hilly Samples	4 Industrial Mrt Surprise	4 Industrii August Int Campus	4 TEM analysis of Houston Composites, September 2014	1 Houston Fibers Mgt M4 Project	3 November '14 Fiber Management - Houston
Sample							1 2			V .		9	6	_		100	1,	# 1	B	-	9	9
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OLD GUANGXI CHINESE TALC SAMPLES

PHOTO ID#	Date	Project Number	Description	Sample	Sample Description	Information on Samples	Additional Package or Comments
SJ060718 - 007	01/00/2003		Guangxi 2			RM MV Tian Song Feng	
SJ060718 - 046	09/00/2004		Guangxi 2			RM MV Danae	
51060718 - 054	1/18/2005		Guangxi 2			RM MV Tai Chang	
51060718 - 061	09/00/2005		Guangxi 2	¥		RM MV Pacific Acadian	
SJ060718 - 066	09/00/2005		Guangxi 2A			RM MV Pacific Acadian	
SJ060718 - 068	3/6/2006		Guangxi 2A			RIM Pos Eternity	
SJ060718 - 073	6/8/2006		Guangxi 2			RM Hebei Arrow	
SJ060718 - 075	9/8/2006		Guangxi 2A			RM Hebei Arrow	
SJ060718 - 085	10/12/2007		Guangxi 2			RM MV Wing	
SJ060718 - 089	11/23/2007		Guangxi 2			RM MV Helenic Sea	
51060718 - 092	11/23/2007		Guangxi 2			RM MV Helenic Sea	
SJ060718 - 098	1/9/2009		Guangxi 2			RM MV Anna Smile	
SJ060718 - 101	9/20/2010		Guangxi 2			RM MV Sonja C	